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October 16, 2018

Clerk Supreme Court of the United States 1 First Street, NE Washington, D.C. 20002

RE: No.18-355:

PRISON LEGAL NEWS V. SECRETARY, FLORIDA DEPARTMENT OF

CORRECTIONS

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* Prison Legal News' Advertisers in Support of Petitioner referenced above contains 4,732 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

As a member of the Supreme Court Bar, I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,

Arthur D. Chotin, Esq.

Principal